



EPA Risk Management Program



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Basic Goal of RMP Program

- Reduce the likelihood of accidental chemical releases by using hazard assessments, prevention programs and emergency response planning



Regulatory Approach

- Congress passed the Clean Air Act Amendments of 1990
- Required EPA to publish regulations and guidance for chemical accident prevention
- Risk Management Plan Rule (RMP Rule) was implemented by EPA in 1999.



Regulatory Approach

- Rule built upon industry standards and codes - as is the OSHA Process Safety Management (PSM) standard implemented in 1990
- Regulations found in 40 C.F.R § 68
- Requires companies that use flammable and toxic substances to develop a Risk Management Plan which includes:

Elements of RMP

Hazard Assessment:

Predicts the potential effects of an accidental release through the development of worst case and alternative case scenarios
and records any accident history within the past five years

RMP Element

Prevention Program:

The most comprehensive RMP element -

Can include safety information & procedures, equipment maintenance & monitoring, employee and contractor training, accident investigation, and the safe management of change.

RMP Element

Emergency Response

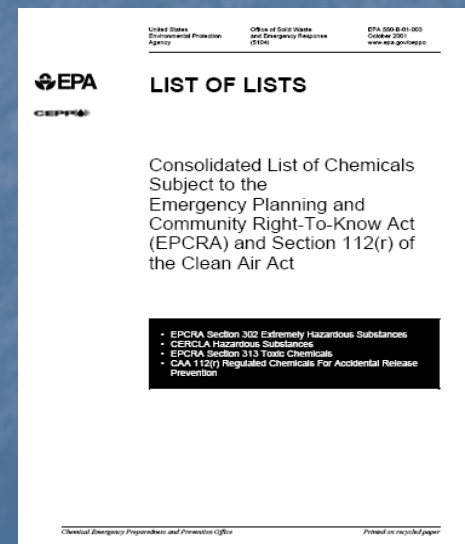
Spells out emergency health care, employee training measures and procedures for informing local responders and the public

Describes the Emergency Response Plan for the facility including first responder training and response equipment maintenance.

Do I Need an RMP?

- You are subject to the rule if:

* You have more than a threshold quantity (TQ) of a listed substance in a process.



<http://www.epa.gov/ceppo/pubs/title3.pdf>

Do I need an RMP?

- A process is: “ Any activity involving a regulated substance, including any use, storage, manufacturing, handling or on-site movement of such substances, or combination of these activities.
- For the purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release , shall be considered a single process”

Covered Facilities Include:

Chemical manufacturers

Drinking water systems

Wastewater treatment works

Ammonia refrigeration systems

Utilities

Federal facilities

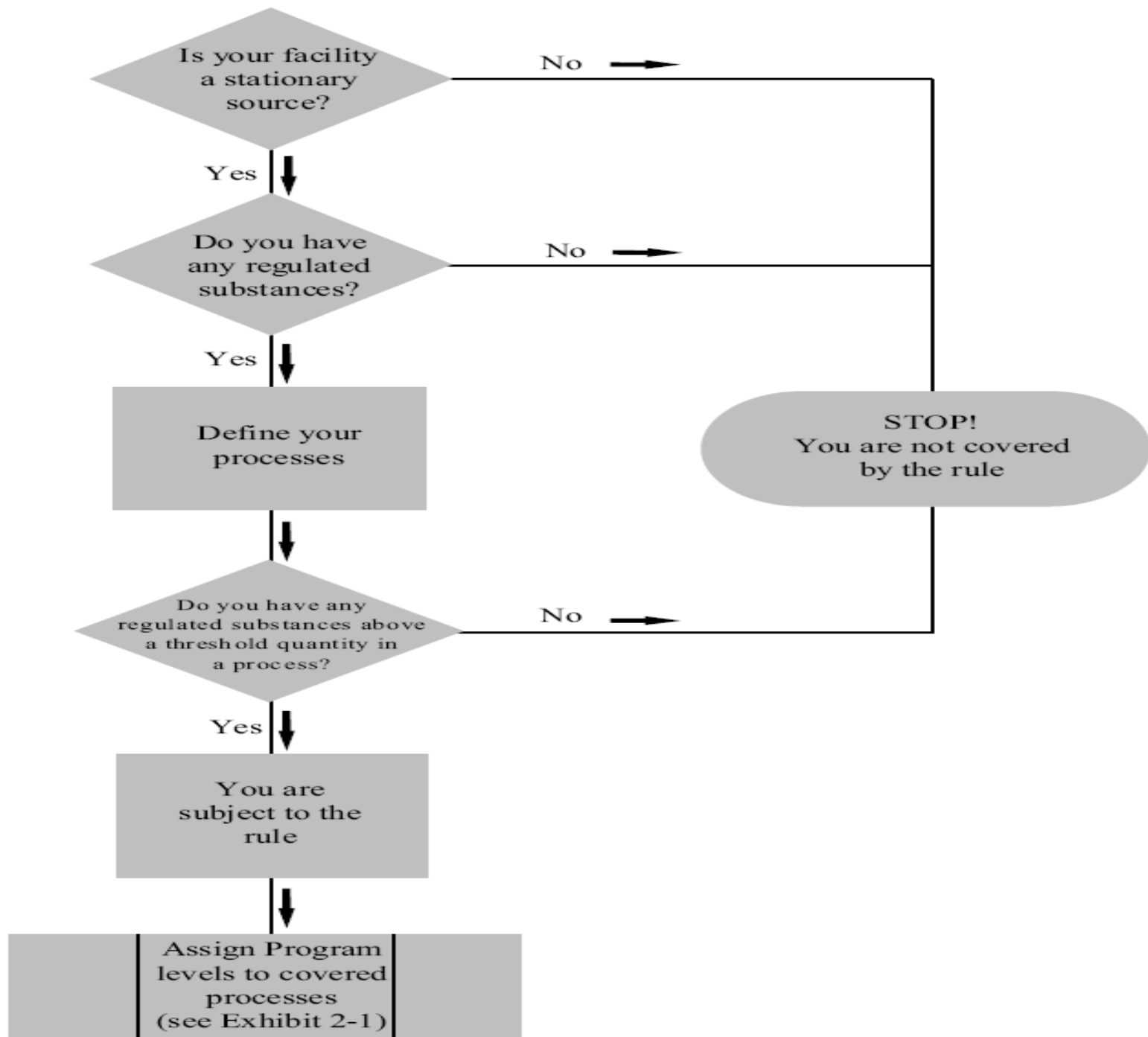
Petroleum Refineries

Agricultural chemicals; and

Nitrogen fertilizers

Widely Used RMP Chemicals

- Anhydrous Ammonia (threshold $Q = 10,000\#$):
 - used for refrigeration: Food storage, processing.
 - and as a fertilizer: Farm cooperatives
- Chlorine (threshold $Q = 2,500\#$):
 - drinking water treatment
 - wastewater treatment
 - generally stored in 150 lb or 1-ton cylinders



What's my Program Level?

Program Level 1:

Process with no public receptors within the distance to endpoint from a worst case release, no accidents with specific offsite consequences within past 5 years

What's my Program Level?

- **Program Level 2:**

Processes not eligible for Program 1 or subject to Program 3 are placed in Program 2 which imposes a streamlined prevention program

- **Program Level 3:**

Processes not eligible for Program 1 - and either subject to OSHA's PSM standard under federal or state OSHA programs or in ten specified NAICS codes are automatically Program 3

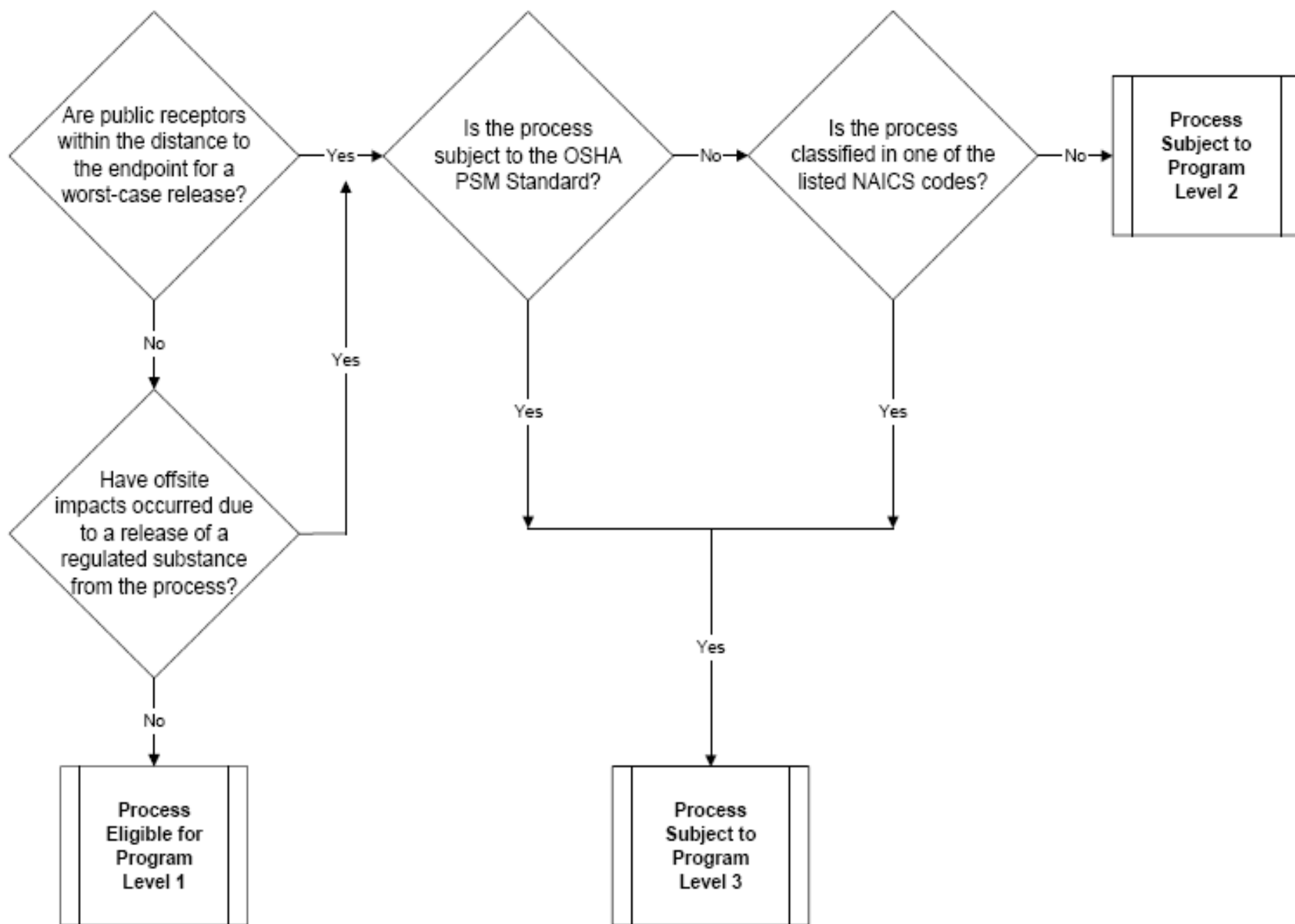
Specified NAICS Codes

- 32211 - pulp mills
- 325181 - alkalies and chlorine
- 325188 - all other industrial inorganics
- 325211 - plastics and resins
- 325192 - other cyclic crude & intermediate manufacturing

Specified NAIC Codes – cont'd

- 325199 - all other basic organic chemical manufacturing
- 325311 - nitrogen fertilizers
- 32532 - pesticide & other agricultural chemicals
- 32411 - petroleum refineries
- 32511 - petrochemical manufacturing

EVALUATE PROGRAM LEVELS FOR COVERED PROCESSES



Summary of New York State RMP Facilities by NAICS Sectors

| Sector # | | Number of Processes | Number of Facilities |
|---------------|---|------------------------|-------------------------|
| 221 | Utilities | 194 | 86 |
| 325 | Chemical Manufacturing | 281 | 46 |
| 311 | Food Manufacturing | 35 | 24 |
| 454 | Nonstore Retailers (Propane Facilities) | 34 | 17 |
| 422 | Wholesale Trade, Nondurable Goods | 20 | 14 |
| 493 | Warehousing and Storage | 40 | 14 |
| 326 | Plastics and Rubber Products Manufa | 8 | 8 |
| 332 | Fabricated Metal Product Manufactur | 9 | 5 |
| 312 | Beverage and Tobacco Product Manuf | 4 | 4 |
| 331 | Primary Metal Manufacturing | 15 | 4 |
| 562 | Waste Management and Remediastion | 4 | 4 |
| 111 | Crop Production | 5 | 3 |
| 322 | Paper Manufacturing | 7 | 2 |
| 334 | Computer and Electronic Product Man | 5 | 2 |
| 327 | Nonmetallic Mineral Product Manufac | 1 | 1 |
| 333 | Machinery Manufacturing | 2 | 1 |
| 481 | Air Transportation | 1 | 1 |
| 482 | Rail Transportation | 1 | 1 |
| 812 | Personal and Laundry Services | 1 | 1 |
| Grand Totals: | | 667 | 232 |

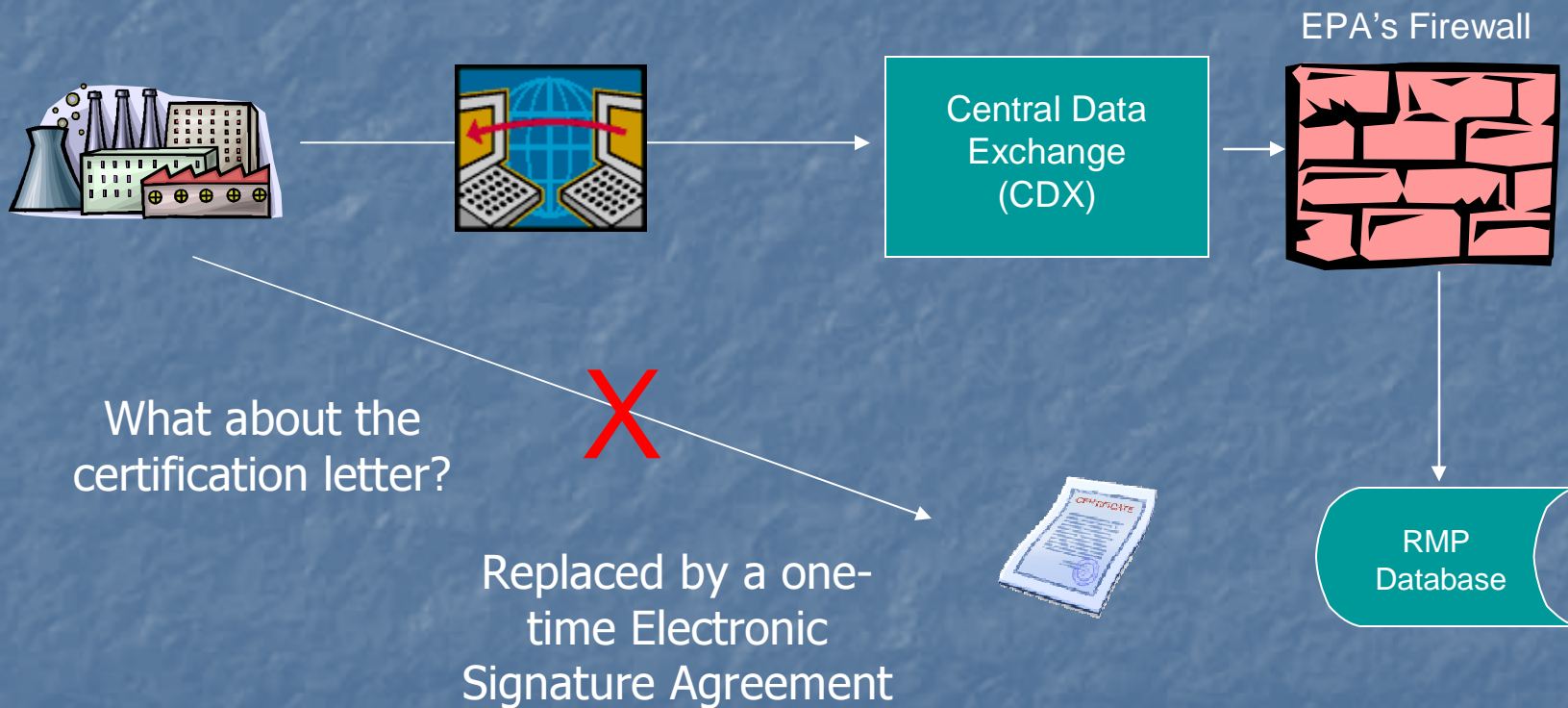
How do I Submit?

- For general guidance, go to:
<http://www.epa.gov/emergencies/content/rmp/index.htm#preparinFg>
- For a submittal checklist, go to:
http://www.epa.gov/OEM/docs/chem/RMP_checklist.pdf

EPA's initiative for web-based RMP submissions

New system: RMP*eSubmit

RMP Submission via the Internet



EPA's initiative for web-based RMP submissions

Central Data Exchange (CDX)

- EPA's secure portal for entering and retrieving information
- Facilities will use CDX to gain access to RMP*eSubmit
- Facilities can use their existing CDX account if they
→ have one

Useful Definitions in CDX

- Certifiers/Certifying Officials – are owners or operators who must certify to the accuracy of the information in the RMP. Only a Certifier can submit the RMP.
- Preparers – have been granted permission by a facility to access the existing RMP. They prepare data for a new or updated RMP. A Preparer cannot submit an RMP.

Accessing CDX

- Navigate to: <https://cdx.epa.gov/>

And for assistance:

- **By Telephone:**

Person-to-person telephone support is available from 8:00 am to 6:00 pm (EST). Call the toll-free line at 888-890-1995.

By E-mail:

Send e-mail to Technical Support at helpdesk@epacdx.net with "Technical Support" in the Subject line.

By Fax:

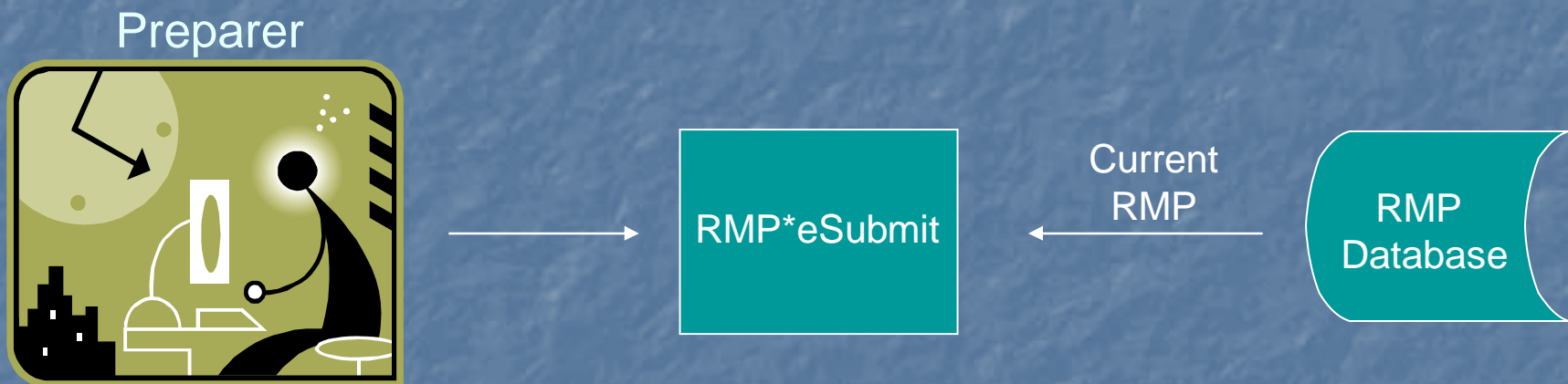
Assistance requests are accepted 24 hours a day at 703-227-4199. Support personnel will respond to faxed requests Monday through Friday from 8:00 am to 6:00 pm EST/EDT.

Submittal Steps

- Register the Certifying Official in CDX
- Complete the Electronic Signature Agreement (ESA) and mail it to EPA
- Register the "Preparer" and activate RMP eSubmit access in CDX

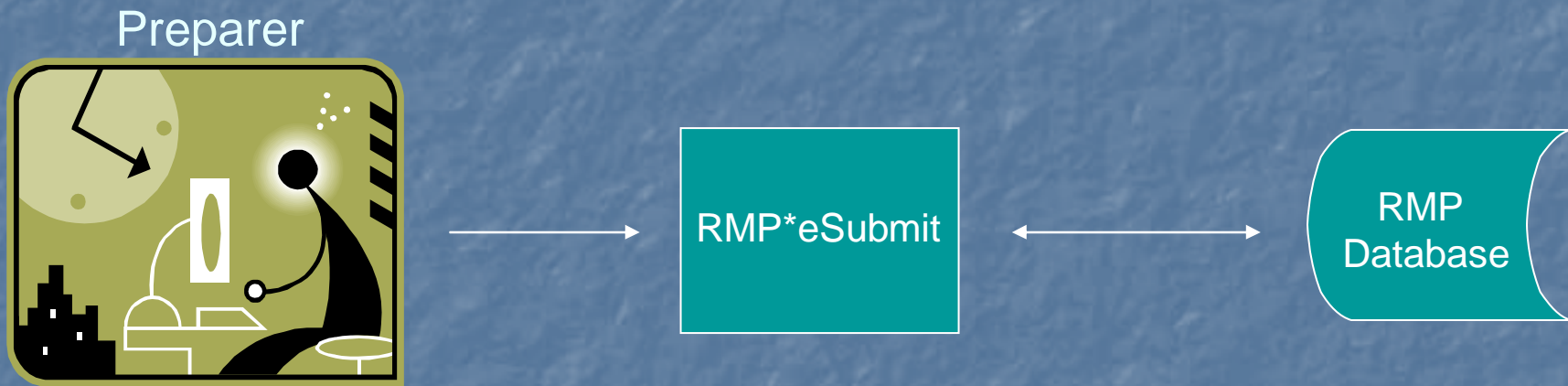
EPA's initiative for web-based RMP submissions

RMP*eSubmit screens are pre-populated with latest RMP if one exists



EPA's initiative for web-based RMP submissions

RMP*eSubmit performs additional validations



- Correction vs. full resubmission
- Validation of submission type
- Validation of certain date fields based on previous RMP



RMP Section Selection - Windows Internet Explorer

http://testngn.epacdxnode.net/rmpesubmit/SelectID.do;jsessionid=A9D07E84E8BC6FDFAB0537F03A20D4ED.r

File Edit View Favorites Tools Help

★ Favorites RMP Section Selection

U.S. Environmental Protection Agency

RMP Section Selection

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100000200695 JB Test Facility 3 Transaction Type: First Time Submission

[Introduction to RMP*eSubmit](#)

Section 1. Registration

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[Add Process](#) [Help](#)

Section 2. Toxics: Worst Case

[Add Scenario](#) [Help](#)

Section 3. Toxics: Alternative Release

[Add Scenario](#) [Help](#)

Section 4. Flammables: Worst Case

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Internet 100%

EPA's initiative for web-based RMP submissions

How the RMP Submission Process Will Work

